

Bonnie MacNaughton (Bar No. 107402)
 Emily Goodell (admitted *pro hac vice*)
 DAVIS WRIGHT TREMAINE LLP
 920 Fifth Avenue, Suite 3300
 Seattle, WA 98104
 Telephone: (206) 622-3150
 Facsimile: (206) 757-7700
 Email: bonniemacnaughton@dwt.com
 emilygoodell@dwt.com

John D. Freed (Bar No. 261518)
 Jean M. Fundakowski (Bar No. 328796)
 DAVIS WRIGHT TREMAINE LLP
 50 California Street, Floor 23
 San Francisco, CA 94111
 Telephone: (415) 276-6500
 Facsimile: (415) 276-6599
 Email: jakefreed@dwt.com
 jeanfundakowski@dwt.com

Attorneys for Plaintiffs AMAZON.COM, INC.
 and AMAZON TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

AMAZON.COM, INC., a Delaware
 corporation, and AMAZON TECHNOLOGIES,
 INC., a Nevada corporation,

Plaintiffs,

v.

UMER WASIM, *et al.*,

Defendants.

Case No. 3:23-cv-05580-TLT

**DECLARATION OF MATTHEW
 CROSSMAN IN SUPPORT OF
 PLAINTIFFS AMAZON.COM, INC. &
 AMAZON TECHNOLOGIES, INC.'S
 MOTION FOR DEFAULT JUDGMENT
 AGAINST DEFENDANTS (1)
 VTLOGODESIGN, INC.; (2) MK
 AFFILIATES, INC.; (3) ALI ALAM; (4)
 DYNAMIC DIGITAL SOLUTIONS LLC;
 (5) MEHWASH MUNIR; (6) ONE STOP
 COMPUTER SERVICES LLC; (7)
 MUHAMMAD ZUBAIR KHAN; (8)
 TECHTURE INC.; (9) MUHAMMAD
 MUDASSAR ANWAR; (10) TECH DRIVE
 PVT LLC; (11) ASHHAR RAWOOF; (12)
 SMART STARTUP SOLUTIONS; (13)
 MUHAMMAD USMAN KHAN; (14)
 YASIR AGAR; (15) MUHAMMAD
 SHIRAZ QURESHI; AND (16) MAVIA
 NIZAM**

Hearing Date: December 10, 2024
Time: 2:00 pm
Location: San Francisco
Courtroom 09, 19th Flr
 Complaint filed: October 30, 2023

1 I, MATTHEW CROSSMAN, declare as follows:

2 1. I am over the age of eighteen and am competent to testify as to the matters set forth
3 herein. I have personal knowledge of the facts in this Declaration, and base this Declaration on
4 my personal knowledge.

5 2. I make this Declaration in support of Plaintiffs' Motion for Default Judgment
6 Pursuant to Federal Rule of Civil Procedure 55(b) as to Defendants: (1) VTLogodesign, Inc.; (2)
7 MK Affiliates, Inc.; (3) Ali Alam; (4) Dynamic Digital Solutions LLC; (5) Mehwash Munir; (6)
8 One Stop Computer Services LLC; (7) Muhammad Zubair Khan; (8) Techtute Inc.;
9 (9) Muhammad Mudassar Anwar; (10) Tech Drive Pvt LLC; (11) Ashhar Rawoof; (12) Smart
10 Startup Solutions, LLC; (13) Muhammad Usman Khan; (14) Yasir Agar; (15) Muhammad Shiraz
11 Qureshi; and (16) Mavia Nizam ("Defendants"). The following facts are personally known by me
12 to be true and, if called and sworn as a witness, I could and would competently testify as follows.

13 3. I am a Senior Manager and Senior Corporate Counsel for the Intellectual Property
14 Operations Group at Amazon.com, Inc. ("Amazon") and have worked at Amazon in this role
15 since December 7, 2021, and at Amazon since September 5, 2017.

16 4. Amazon owns the domain Amazon.com. Attached hereto as **Exhibit A** is a true
17 and correct screenshot of a portion of the Amazon.com website captured on August 21, 2024.

18 5. The upper left corner of the site features—and has featured during the entire period
19 relevant to this lawsuit—an Amazon logo consisting of the word "amazon" in white text, under
20 which appears an orange arrow in the shape of a smile. This logo is a registered trademark owned
21 by Amazon subsidiary (and co-Plaintiff) Amazon Technologies, Inc. (Reg. Number 6,666,404).
22 The color scheme of Amazon.com is white, Smile Orange (orange), black, and Squid Ink (dark
23 blue).

24 6. Amazon's people and powerful tools are dedicated to ensuring that our customers
25 have a trustworthy shopping experience. We continue to invent new ways to put our customers
26 first and work with private and public sector partners around the world to improve consumer
27 experiences and protect them from bad actors.
28

7. Amazon relies upon its name and registered trademarks to distinguish its products and services from the products and services of others. Amazon is dedicated to ensuring that its trademarks signal the exceptional level of quality and service that Amazon customers have come to know and expect from Amazon.

8. Amazon has never used the following domains to advertise, to facilitate billing, or for any other purpose related to its business, or the business of APub or KDP:

- a. amazondigitalpublishing.com (“Website 6”);
- b. amazonkindledirectpublishing.com (“Website 7”);
- c. amazondigitalpublisher.com (“Website 8”);
- d. amazondigitalpublishers.com (“Website 9”);
- e. amazonpublishingsol.com (“Website 10”);
- f. amazonproinc.com (“Website 11”);
- g. amazonprofinc.com (“Website 12”);
- h. amazonkindlebookpublishing.com (“Website 13”);
- i. amazonkindleproinc.com (“Website 14”);
- j. amazonkdpublishers.com (“Website 15”);
- k. amazonpublishers.ca (“Website 16”);
- l. amazonbookhub.com.au (“Website 17”);
- m. amazondigitalpro.com (“Website 18”);
- n. amzdigitalpro.com (“Website 19”);
- o. amazonpublisherpro.com (“Website 20”);
- p. amazonpublishingzone.com (“Website 21”);
- q. amazonkdpublishing.com (“Website 22”);
- r. amazonkdpublication.com (“Website 23”);
- s. amazonpublishingpartner.com (“Website 24”);
- t. amazonprofessionalpublishers.com (“Website 25”);
- u. amzkindlepublishing.com (“Website 26”);
- v. amazonkindlepublications.com;

1 w. selfpublishingkdp.com;
2 x. vtlogodesign.com;
3 y. smartstartupsolutions.com;
4 z. wedrivetech.com;
5 aa. techtureinc.com;
6 bb. techture.co; and
7 cc. mkaffiliatenetwork.com.
8

9 I declare under penalty of perjury under laws of the United States that the foregoing is true
10 and correct. Executed this 11th day of September, 2024 in New York, New York.

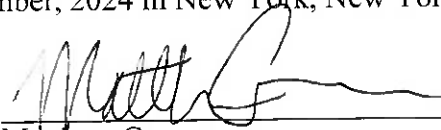
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13 Matthew Crossman
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EXHIBIT A

